

### REMARKS

Claims 1-22 are pending in the application. These claims were rejected as follows:

Claims / Section	35 U.S.C. Sec.	References / Notes
1-3, 7-12, 15 & 16	§102(b) Anticipation (technically, this is a 102(e) reference)	<ul style="list-style-type: none"><li>• Brown, et al. (U.S. Patent No. 6,609,077).</li></ul>
4-6	§103(a) Obviousness	<ul style="list-style-type: none"><li>• Brown, et al. (U.S. Patent No. 6,609,077); and</li><li>• Burlison, et al. (U.S. Patent No. 6,880,137).</li></ul>
13	§103(a) Obviousness	<ul style="list-style-type: none"><li>• Brown, et al. (U.S. Patent No. 6,609,077); and</li><li>• Sugamori, et al. (U.S. Patent No. 6,631,340).</li></ul>
14	§103(a) Obviousness	<ul style="list-style-type: none"><li>• Brown, et al. (U.S. Patent No. 6,609,077); and</li><li>• Maggi, et al. (U.S. Patent No. 4,554,636).</li></ul>
17-20	§103(a) Obviousness	<ul style="list-style-type: none"><li>• Brown, et al. (U.S. Patent No. 6,609,077); and</li><li>• Niwa, et al. (U.S. Patent No. 6,448,799).</li></ul>
21 & 22	§103(a) Obviousness	<ul style="list-style-type: none"><li>• Brown, et al. (U.S. Patent No. 6,609,077);</li><li>• Burlison, et al. (U.S. Patent No. 6,880,137); and</li><li>• Niwa, et al. (U.S. Patent No. 6,448,799).</li></ul>

5 Applicant has provided discussion below for distinguishing the present invention from the art cited against it.

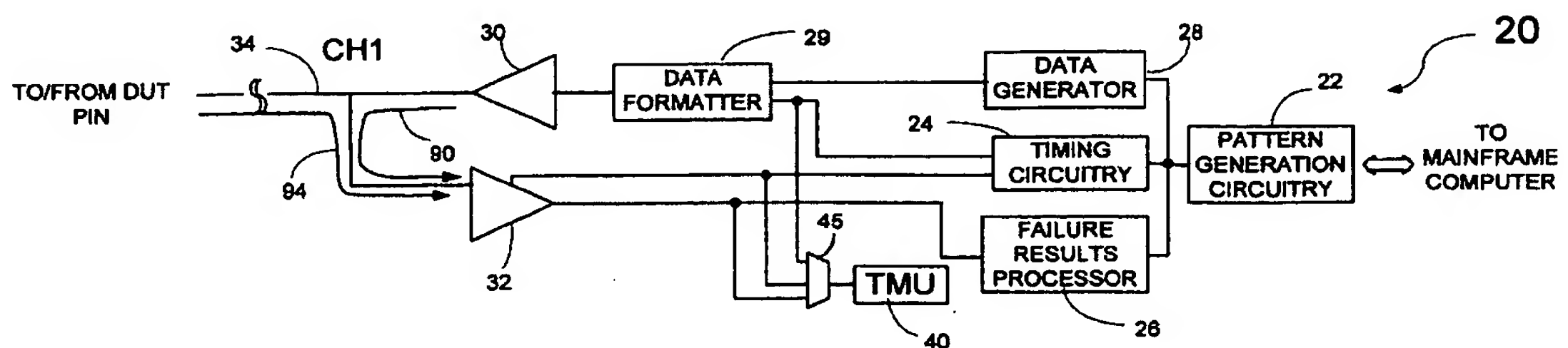
Applicant's use of reference characters below is for illustrative purposes only and is not intended to be limiting in nature unless explicitly indicated.

**35 U.S.C. §102 CLAIMS 1-3, 7-12, 15 AND 16 ANTICIPATION BY BROWN**

1. *Brown fails to teach or suggest the evaluation-drive circuitry where at least one signal circuit is driven so that a time reference of the signals generated by the signal circuits relative to one another is set corresponding to at least one*  
5 *prescribed value.*

Figure 1 of the present application illustrates an embodiment of the invention as claimed in independent claims 1 and 15, wherein the evaluation drive circuitry evaluates the signals generated by the signal circuits 12 and 16. The evaluation reveals which of the signals is slower. If, e.g., the signal produced  
10 by the signal circuit 16 is slower, a corresponding delay line 28 is reduced such that the signal is generated earlier by the signal circuit 16. This is repeated until the signal circuits 12 and 16 are driven such that the signals generated by them are almost simultaneous, i.e., that a relative time reference of the signals is set to almost zero (or to some prescribed value).

15 Brown relates to automatic test equipment for testing a semiconductor device. The test equipment includes a computer workstation and pin electronics circuitry coupled between the semiconductor device and the computer. The pin electronics circuitry includes a plurality of channels, one of which is shown in the Figure (from Brown, Figure 1) below.



The channel has timing circuitry 24 operative in response to desired programmed timing information. It further has driver/comparator circuitry 30, 32 coupled to the timing circuitry for driving test waveforms at a period  $T$ , and for sampling data from the waveforms at a beat period  $T \pm \Delta t$ . The channel further  
5 has a timing measurement unit 40. The timing measurement unit 40 is coupled to the driver/comparator circuitry 30, 32 for measuring the relative timings of the sampled data.

In the OA, on p. 2-3, the Examiner indicates that:

a) the timing measurement unit 40 is configured to evaluate a signal  
10 generated by at least one of a pattern generation circuitry 22, a timing circuitry 24, a data generator 28, a data formatter 29 and the driver circuit 30; and that

b) the timing measurement unit 40 is configured to drive, dependent on the evaluation in a), at least one of these circuits; and that

c) the driving of b) results in a time reference of signals generated by  
15 these circuits relative to one another being set corresponding to at least one prescribed value.

The Applicant respectfully disagrees with this characterization of the teachings of Brown.

According to the abstract, the timing measurement unit 40 is for  
20 measuring the relative timings of sampled data. Furthermore, according to col. 3, lines 42-45, the timing measurement unit 40 includes hardware to acquire timing data. However, none of the disclosure of Brown indicates or suggests that

the timing measurement unit could be used for driving a signal circuit as required by the language of the independent claims in the application.

Consequently, no signal circuits can be driven by the timing measurement unit such that a time reference of signals generated by signal circuits relative to one another is set corresponding to at least one prescribed value.

For these reasons, the Applicant asserts that the amended claim language clearly distinguishes over the prior art, and respectfully request that the Examiner withdraw the §102 rejection from the present application.

**35 U.S.C. §103 CLAIMS 4-6, 13, 14 AND 17-22 OBVIOUSNESS OVER BROWN IN VIEW OF BURLISON, SUGAMORI, MAGGI, AND NIWA**

*2. Applicant relies on the above argument and a lack of teaching regarding the evaluation-drive circuitry by any of the additionally added reference in asserting that the present invention is not obviated by the combination of references.*

In the OA, on pp. 3-7, the Examiner adds the patent references Burlison, Sugamori, Maggi, and Niwa as disclosing various elements of the dependent claims. Without addressing these arguments related to the dependent claim elements, Applicant relies on the arguments made above and asserts that the addition of these references, alone or in combination, fails to teach or suggest the evaluation-drive circuitry as claimed in the independent claims of the application and therefore the independent claims are not obviated by this combination of references.

For this reason, the Applicant asserts that the amended claim language clearly distinguishes over the prior art, and respectfully request that the Examiner withdraw the §103 rejection from the present application.


### CONCLUSION

5 Inasmuch as each of the objections have been overcome by the amendments, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that a timely Notice of Allowance be issued in this case.

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Respectfully submitted,

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### CERTIFICATE OF MAILING

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I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450 on April 19, 2006.

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